

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED _____
ANTHONY JACKSON	:	<u>VIOLATIONS:</u>
	:	21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)
	:	(possession with the intent to distribute
	:	more than 5 grams of cocaine base
	:	("crack") - 1 count)
	:	21 U.S.C. § 860(a) (possession with the
	:	intent to distribute more than 5 grams of
	:	cocaine base ("crack") within a thousand
	:	feet of a school - 1 count)
	:	18 U.S.C. § 924(c) (possessing a firearm in
	:	furtherance of a drug trafficking crime -
	:	1 count)
	:	18 U.S.C. § 922(g)(1) (possession of a
	:	firearm by a convicted felon - 1 count)
	:	Notice of additional factors
	:	Notice of forfeiture

SUPERSEDING INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about April 3, 2003, at Philadelphia, in the Eastern District of Pennsylvania,
defendant

ANTHONY JACKSON

knowingly and intentionally possessed with the intent to distribute in excess of five (5) grams,
that is approximately forty-eight (48) grams, of a mixture or substance containing a detectable
amount of cocaine base ("crack"), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 3, 2003, at Philadelphia, in the Eastern District of Pennsylvania,
defendant

ANTHONY JACKSON

knowingly and intentionally possessed with the intent to distribute in excess of five (5) grams, that is approximately forty-eight (48) grams, of a mixture or substance containing cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising St. Barnabas School, a private elementary school located at 64th Street and Buist Avenue in Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(b).

In violation of Title 21, United States Code, Section 860(a).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 3, 2003, at Philadelphia, in the Eastern District of Pennsylvania,
defendant

ANTHONY JACKSON

knowingly possessed a firearm, that is, a 9mm Smith & Wesson semiautomatic handgun, loaded with twelve (12) rounds of ammunition, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute cocaine base (“crack”), in violation of Title 18, United States Code, Section 841(a)(1), as charged in Count One of this Indictment, and possession with intent to distribute cocaine base (“crack”) within one thousand feet of a school property, in violation of Title 21, United States Code, Section 860(a), as charged in Count Two of this Indictment.

In violation of Title 18, United States Code, Section 924(c)(1).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 3, 2003, at Philadelphia, in the Eastern District of Pennsylvania,
defendant

ANTHONY JACKSON,

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce, a Smith & Wesson 9mm semiautomatic handgun, loaded with twelve (12) live rounds of ammunition.

In violation of Title 18 United States Code, Section 922(g)(1).

NOTICE OF ADDITIONAL FACTORS

THE GRAND JURY FURTHER CHARGES THAT:

1. In committing the offenses charged in Counts One, Two and Four of this indictment, defendant ANTHONY JACKSON:

a. Committed the instant offense while under a criminal justice sentence, that is, parole, as described by U.S.S.G. § 4A1.1(d).

b. Committed the instant offense less than two years after release from imprisonment on a sentence of imprisonment exceeding one year and one month, as described by U.S.S.G. § 4A1.1 (a) and (e).

c. Was a career offender, as described by U.S.S.G. § 4B1.1.

d. Used and possessed a firearm and ammunition in connection with another felony offense, as described in U.S.S.G. § 2K2.1(b)(5).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Sections 924(c) and 922(g)(1) as set forth in Counts Three and Four of this indictment, defendant

ANTHONY JACKSON

shall forfeit to the United States of America, pursuant to Title 28 United States Code, Section 2461(c) and Title 18 United States Code, Section 924(d), the firearm and ammunition involved in the commission of these offenses, including a 9mm Smith & Wesson semiautomatic handgun, loaded with twelve (12) rounds of ammunition.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 924(d).

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
UNITED STATES ATTORNEY